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December 1, 2022

By ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Jones, et al. v. The City of New York, No. 17 Civ. 7577

Dear Judge Koeltl:

This firm, together with co-counsel Romano & Kuan PLLC and Kaufman Lieb Lebowitz & Frick, represents Plaintiffs Baron Spencer and Lloyd Jones in this action.

As the Court requested during the conference held on Monday, November 28, we have revised and are filing the following documents:

1. A revised proposed Preliminary Approval Order (**Exhibit 1**) incorporating the edits the Court requested, together with a blackline (**Exhibit 2**) showing where those edits have been made to the order.

In addition to the Court's edits, the parties jointly decided to add paragraph 13 to the proposed preliminary approval order. That paragraph sets forth the "Bar Date" (June 6, 2023) by which class members must submit claim forms online or mail and postmark claim forms in order to file a timely claim. We note that the definition of "Bar Date" in the Settlement Agreement ¶ 13 states that a claim form must be mailed and postmarked by the Bar Date, while Settlement Agreement ¶ 96 erroneously states that the claim form must be received by the Bar Date. Settlement Agreement ¶ 13 is correct and is reflected in the long-form notice, summary notice, claim form, cover letter, and email notice to the class.

2. A declaration of Tiffaney Janowicz of Rust Consulting addressing two issues raised by the Court: (a) an explanation of why mailing of the summary notice to class members is preferable to mailing the long-form notice; and (b) explaining that the content of notice in

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publication advertisements will be identical to the summary notice, while the content of advertisements in other media (radio, television, social media) will be based upon the summary notice and adapted based on the medium and the respective requirements for each media outlet. Attached to the Janowicz declaration are the following exhibits:

- a. **Exhibit A:** Revised Summary Notice (clean)
- b. **Exhibit B:** Blackline Summary Notice
- c. **Exhibit C:** Revised Long-form Notice (clean)
- d. **Exhibit D:** Blackline Long-form Notice

Thank you for your consideration.

Respectfully Submitted,

/s/ Debra L. Greenberger
Debra L. Greenberger